

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

NEIL COLE,

Defendant.

No. 19-cr-00869 (ER)

**NOTICE OF MOTION *IN LIMINE* TO EXCLUDE STATEMENTS BY ETHAN COLE**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, defendant Neil Cole will move this Court, before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York, on a date and time to be determined by the Court, for an order granting Mr. Cole's Motion *in Limine* to exclude statements by Ethan Cole, and for such other relief as the Court may deem just and proper.

Dated: New York, New York  
October 3, 2022

/s/ Sean Hecker  
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